

**North American Numbering Council
Meeting Minutes
November 19-20, 2002 (Final)**

I. Time and Place of Meeting. The North American Numbering Council held a meeting commencing at 9:00 a.m., at the Federal Communications Commission, 445 12th Street, S.W., TW-C305, Washington, D. C.

II. List of Attendees.

Voting Council Members:

1. Robert Atkinson	Chairman
2. Teresa Gaugler	ALTS
3. Pamela Connell	AT&T
4. Randy Sanders	BellSouth
5. Michael Altschul	CTIA
6. Maureen Flood	CompTel
7. Greg Pattenaude	NARUC
8. Peter Pescosolido	NARUC
9. Helen Mickiewicz	NARUC
10. Hon. Robert B. Nelson	NARUC
11. Joel Cheskis	NASUCA
12. Beth O'Donnell	NCTA
13. David Bench	Nortel Networks
14. John McHugh	OPASTCO
15. C. Courtney Jackson	OUR
16. Deborah Bell	SBC Communications, Inc.
17. Hoke Knox	Sprint
18. Michael O'Connor	Verizon
19. Karen Mulberry	WorldCom

Special Members (Non-voting):

John Manning	NANPA
Jean-Paul Emard	ATIS

Commission Employees:

Sanford Williams, Designated Federal Officer (DFO)
Pam Slipakoff, Alternate DFO
Deborah Blue, Special Assistant to the DFO
Cheryl Callahan, Assistant Chief, Telecommunications Access Policy Division

III. Estimate of Public Attendance. Approximately 37 members of the public attended the meeting as observers.

IV. Documents Introduced.

- (1) Agenda
- (2) 2003 NANC Meeting Schedule
- (3) NANPA Report to the NANC
- (4) Status of Area Code Relief Exhausting within 36 Months
- (5) Numbering Administration Oversight Working Group Report to the NANC
- (6) Letter from Robert Atkinson to William Maher, Chief, Wireline Competition Bureau, regarding Grandfathered Wireless NXX Codes
- (7) National Thousands Block Number Pooling Services
- (8) INC Report to the NANC
- (9) NANP Expansion/Number Optimization IMG Report to the NANC (Final Report)
- (10) NANC IMG Review of Intermediate Numbers
- (11) NANC IMG Review of Soft Dial Tone Numbers
- (12) Memorandum to Robert Atkinson from the California Public Utilities Commission on Intermediate Numbers
- (13) LNPA Working Group Status Report to the NANC
- (14) Wireless Number Portability Operations Status Report to the NANC
- (15) NANPA Fund Performance Status Report & Funds Projection
- (16) VoIP Numbering Issues Report

V. Summary of the Meeting.

A. Announcements and Recent News. Chairman Atkinson noted a change in the Agenda. He proposed that the VoIP item be moved from new business and changed to Agenda Item number 15(a). Chairman Atkinson noted the 2003 NANC meeting schedule and indicated that the meetings are scheduled for one day every other month, from 9:00 AM to 5:00 PM.

B. North American Numbering Plan Administrator (NANPA) Report to the NANC. John Manning, NANPA, provided the report to the Council.

Central Office Code (CO) Activity Report. Mr. Manning reported that the total number of assignments for the month of October were 623 codes. The total assignments in the first ten months of 2002 were 6,700 codes. Net assignments were 3,222 codes. He noted that in comparing the first ten months of 2002 with the same time period in 2001, assignments are down by 2,479 codes. The total returns in the first ten months of 2002 were 3,298. Mr. Manning noted that in comparing the 2002 returns with the same time period in 2001 (5,054), total returns are down by 1,756 codes. He stated that there continues to be a decline in the number of assignments. Mr. Manning further stated that there is beginning to be a decline in the number of returns when comparing 2002 to 2001. He noted that the decline occurred around October 22, 2002 when wireless carriers in

pooling NPAs were no longer assigned CO Codes. Mr. Manning stated that in that timeframe, the number of wireless service provider CO Code applications declined.

NPA Relief Planning Status Report. Mr. Manning reviewed the chart on the status of area code relief exhaust over the next 36 months, highlighting NPA codes that are expected to exhaust within the next 12 months. He noted that the following four NPA codes are expected to exhaust within the next 12 months: (1) 310 in California, (2) 909 in California, (3) 616 in Michigan, and (4) 630 in Illinois. He stated that NANPA does not anticipate a problem with NPA code 616 because a plan is underway involving implementation of a split. NPA 630 has an overlay planned. He pointed out that there is a very small quantity of codes remaining in NPA codes 310 and 909. NPA code 310 is in rationing at 2 NXX codes every other month. The rationing level for NPA code 909 has been reduced to 2 NXX codes per month. Michael O'Connor, Verizon, remarked that, even if action were taken today, it would take a minimum of one year to get area code relief completed in these 2 NPA's. Beth O'Donnell questioned whether there is a supply of numbers with the Pooling Administrator that will serve as a buffer. Mr. Manning responded that as far as NANPA's inventory of codes, there are none to draw upon. Helen Mickiewicz, NARUC, advised that there are numbers in the pools in both NPAs 310 and 909 in California. Chairman Atkinson questioned whether it is expected that California will run out of numbers. He further questioned what is the current plan of the California PUC. Ms. Mickiewicz stated that she could not answer his question. Chairman Atkinson questioned who is responsible for solving this problem. Ms. Mickiewicz responded that it is Loretta Lynch, President of the California PUC. She advised that the industry has made efforts to make the California PUC aware of the problem and of the need for a solution.

Changes in NPA Exhaust Projections. Mr. Manning reported that NANPA reviewed the forecast data made available by the Pooling Administrator (PA) in September 2002 with regard to the demand for CO codes with the implementation of wireless pooling. He stated that NANPA did an analysis of several NPAs that were projected to exhaust within the next three years to determine if adjustment in the forecasted exhaust date is warranted. Mr. Manning advised that the PA only reflected the impact of wireless pooling on its need for CO codes over the next 12 months. He stated that based on the information from the PA NANPA modified several NPA code exhaust projections. Mr. Manning reported that NANPA published its initial analysis on October 18, 2002. He indicated that a subsequent report on October 28, 2002 was published that included two additional NPAs that changed exhaust dates. The most recent report dated October 31, 2002 reflects the reduction in the rationing level for all California NPAs in rationing to two NPA codes per month. Ms. Mickiewicz gave an explanation for the reduction of rationing to two NPA codes per month in every NPA in California. She stated that the idea was to allow the rationing to continue while the California PUC evaluated how things would proceed after pooling for wireless carriers. Ms. Mickiewicz further stated that after 6 months, if the California PUC finds that there is no real need to continue rationing, they will consider eliminating it.

NRUF Update – Adding the Federal Registration Number (FRN) to Form 502. Mr. Manning reported that at the September 24, 2002 NANC meeting, NANPA informed the NANC that it had been directed by the FCC to add an additional data element, the FRN to the NRUF Form 502. He stated that the updated form would be used with the February 1, 2003 NRUF reporting cycle. Mr. Manning advised that NANPA has updated the Form 502 Excel spreadsheet and added the FRN field to the “Company Information” page. The field appears directly below the Service Provider OCN field and directly above the Service Provider Type field. The FTP file format has been updated as well. Mr. Manning cautioned the service providers not to use the revised form until January 1, 2003, in connection with the February 1, 2003 NRUF reporting cycle. He noted that both the revised Form 502 and the FTP file formats will be posted to the NANPA web site the week of November 18, 2002 and notification sent out via the NRUF email distribution list.

Carrier Identification Codes (CICs) for Switchless Resellers. Mr. Manning reported that NANPA recently received direction from the FCC regarding assigning Feature Group (FG) D CICs to switchless resellers. He indicated that in accordance with the guidelines and NANPA’s interpretation of those guidelines, NANPA had not been assigning CICs to carriers who did not show access and usage. Mr. Manning stated that there has been a revision with regard to CICs and their assignment. He reported that carriers do not have to purchase FG D access in order to get a CIC. CICs can be assigned to switchless resellers. Mr. Manning stated that in order to facilitate the application process for switchless resellers, NANPA has provided, on its web site, the following information: Submit a fully completed CIC Application form to NANPA. In order for this application to be processed, all appropriate fields on the form must be filled in. Provide NANPA with documentation that validates their switchless reseller status. The preferred document to verify this status would be one issued by a state public utility commission. If the state commission in which the applicant operates does not issue such documents, NANPA requires a duly authorized officer of the applicant company to submit a certified declaration attesting to the switchless reseller status of the applicant. Mr. Manning stated that the INC addressed this issue at its November 2002 meeting. He reported that INC Issue 392, Elimination of FG D Access Requirement for Switchless Resellers is currently in initial closure. The proposed resolution statement to this issue is the same as the current direction NANPA has provided.

C. Number Administration Oversight Working Group (NAOWG) Report.
Karen Mulberry, WorldCom, presented the report to the Council.

Report and Recommendation on the Pooling Administration System (PAS) Forecasting Requirements. Ms. Mulberry reported that the NAOWG investigated and analyzed requirements for PAS and for Forecasting and came up with two critical threshold items: whether the guidelines or the requirements intended to require PAS to create an environment where block applicants would be denied resources, if the quantity of blocks requested in a particular month exceeded the quantity of blocks forecasted, and whether applicants should be required to submit a replacement forecast before applying for additional blocks. Ms. Mulberry stated that after the NAOWG’s analysis, it was

concluded that the PAS design conflicts with stated requirements at the time of the issuance of the contract. The NAOWG recommended that PAS should be modified to allow applicants to be assigned thousands blocks if there is a sufficient supply of blocks in the pool. Ms. Mulberry stated that according to the guidelines and the requirements at the time that the contract was initiated, applicants were not required to update their forecast even if they were requesting more blocks than was forecasted for a particular month.

Chairman Atkinson read the following statement from NeuStar regarding the Pooling Administration System (PAS): "NeuStar, the Pooling Administrator inventor of the FCC's PAS, respectfully declines to comment on this report. We suggest that any perceived discrepancy between the system and the guidelines be directed to Mr. Mark Oakey, who has oversight of this contract as the FCC's Contracting Officer." Chairman Atkinson stated that based on that response, the appropriate thing for the NANC to do would be to forward this report and recommendation to Mr. Oakey. Randy Sanders, BellSouth, questioned whether the NANC will know the final outcome. Sanford Williams responded that once Mr. Oakey has made a decision, Ms. Blue will disseminate the answer to the NANC members. Chairman Atkinson will send a transmittal letter to Mr. Oakey attaching the NAOWG report and requesting that he advise the NANC of his decision. Deborah Bell, SBC, questioned whether, during the interim, applications still will be rejected. Ms. Mulberry responded that the working group did not propose an interim solution. She advised that there is a process to go in and immediately update your forecast and then go back and submit your application. Ms. Mulberry commented that what should be an easy one step process is more of a two or three step process. She explained that it does not prevent you from getting your assignment, but it does require you to go in and update your forecast before you can apply for an assignment. Ms. Mulberry further explained that whatever you forecast in a month is the limit for what you can be assigned.

2002 NANPA Performance Survey, Cover Letter and Timeline. Ms. Mulberry reported that the NAOWG modified the 2001 Survey to include the Code Administration System (CAS). She stated that the NAOWG solicited comments from NANPA and revised the survey accordingly. Ms. Mulberry reviewed the final survey with the NANC. She advised that the NAOWG would like to obtain NANC approval of the final survey. Ms. Mulberry stated that the NAOWG would like to start the distribution process for the final survey on November 22, 2002. She further stated that the NANPA will post the survey on the NANPA web site and the industry associations will distribute the survey to their membership. Mr. Sanders inquired as to whether there have been any significant changes to this survey. Ms. Mulberry responded that there have not been significant changes from last year. The NANC approved the survey and memo for distribution. Chairman Atkinson stated that he will offer a plaque to the association with the best return level. The due date for the completed survey is December 31, 2002. The NAOWG will present the final report to the NANC on March 3, 2003.

Status of 2002 NANPA Performance Improvement Plan (PIP) Items. Ms. Mulberry stated that the NAOWG meets with NANPA on a monthly basis to review the progress

on PIP items. She reported that there are seven PIP items noted by topic: PIP 1 – Code Administration System (CAS); PIP 2 – NANPA Web Site; PIP 3 – Code Administration; PIP 4 – Relief Planning; PIP 5 – NRUF; PIP – 6 – Measurements; and PIP – 7 General.

Outstanding PA Change Order Review. Ms. Mulberry reported that the NAOWG received direction from the FCC to begin reviewing the PA Change Orders and provide proposed recommendations. She stated that the NAOWG has completed its initial review of all of the outstanding Change Orders. Ms. Mulberry indicated that the NAOWG is working on developing a recommendation template. She stated that for particular Change Orders, the NAOWG is composing questions for clarification, which will be submitted to the FCC. Ms. Mulberry reported that the open Change Orders are Change Orders 6 and 10-16. The NAOWG is working to finalize the recommendations. The recommendations will be furnished to the FCC and the NANC members will be copied. Ms. Mulberry stated that these recommendations do not require NANC approval for communication to the FCC. Chairman Atkinson proposed that the appropriate way to handle this would be to get NANC consensus that the NANC does not want to get involved in second-guessing and reviewing these Change Orders. There were no objections from NANC members.

Ms. Mulberry reviewed the upcoming meeting schedule with the NANC members. She advised that if anyone is interested in joining the NAOWG, to please contact one of the Co-Chairs. All of the NAOWG meeting records and documents are posted on the NANC Chair web site.

Grandfathered NXX Codes. Chairman Atkinson advised that on behalf of the NANC, he had submitted the letter on Grandfathered Wireless NXX Codes to the FCC on October 23, 2002. Ms. Mickiewicz stated that the California PUC wrote a letter to the PA asking that any blocks in the grandfathered codes not be put into the pools that are going in all area codes but one in California. She indicated that the PA forwarded a copy of the letter along with a cover letter to the FCC. Michael O'Connor, Verizon, commented that Verizon has filed a petition, but the petition has not yet been put out for public comment. He stated that it is his understanding that in all states where grandfathered codes have been donated, NeuStar will not be assigning those blocks until industry and regulators can figure out what the right answer is. Barry Bishop, NeuStar, agreed. Mr. Bishop stated that a similar letter was also received from the New York PSC. He further stated that NeuStar informed the FCC that it does not intend to act on these letters for now unless directed otherwise by the FCC. Mr. O'Connor stated that it is his understanding that the INC has an issue in initial closure, that may go to final closure by the end of the week, which would modify the guidelines so that these codes do not get assigned until regulators and industry have a chance to decide on the best approach. He further stated that once the INC guidelines are in effect, the PA and the NANPA must abide by them unless directed by a regulatory agency to do otherwise. Mr. Bishop responded that Mr. O'Connor is correct.

D. Presentation by National Thousands-Block Pooling Administrator (PA).

Barry Bishop, NeuStar, provided the report to the Council. Mr. Bishop stated that since

the implementation of the national rollout began on January 4, 2002, there have been 64 First Implementation Meetings (FIMs) for 97 NPAs (including overlays and splits in permissive dialing). The FIMs for the 4th Quarter of the rollout schedule were completed on October 17, 2002. The schedule for the 5th Quarter of the rollout was posted on October 31, 2002. The FIMs for the 5th Quarter of the rollout will begin on December 4, 2002 and end on February 5, 2003.

Mr. Bishop provided an update on wireless pooling implementation. He reported that intra-SP ports and donations were completed on November 1, 2002. Over 1900 blocks that were identified to the PA on August 15, 2002 as donations were taken back by service providers for various reasons prior to November 1, 2002. Mr. Bishop reported that a list of the take backs detailing the areas, number of blocks, service providers, and reasons for the take back (where available) has been forwarded to the FCC. A revised assessment was completed by the PA on November 15, 2002. He indicated that the revised assessment shows that 12 states were affected; 19 NPAs were affected; 23 Rate Centers were affected; 2065 blocks forecasted; 1453 blocks were donated; 77 NXX codes will need to be opened; and prior to the take back, 17 NXX codes were needed at first assessment. Mr. Bishop advised that the first date for wireless service providers to apply for a block was November 4, 2002. He noted that a little more than 1000 requests have been received, with the majority being in California.

Mr. Bishop reported that no new Change Orders have been filed since September 18, 2002. He reported on the outstanding Change Orders: Change Order #6 – CO NXX Issue #295 – change to Selection Process of Code Holder; Change Order #7 – PAS Security; Change Order #10 – LNPA Issue #319 – Intra-SP Porting for Rate Center Telephone Number Administration; Change Order #11 – CO/NXX Issue #195 – Final Jeopardy Procedures; Change Order #12 – changes to the TBPAG identifying rules within FCC 01-362; Change Order #13 – Modification to User Profile Application Appendix 5; Change Order #14 – Modify Part 3 Form in TBPAG; Change Order #15 – Update MTE in COCAG; and Change Order #16 – LNPA Issue #335 – AOCNs Performing Initial Thousand Block Entries into BIRRDs.

Mr. Bishop reviewed with the NANC, the October and November 2002 Thousands Block Pooling Reports that were submitted to the FCC by the PA. He reported that for the month of October 2002, of the 1623 applications that were processed, 1253 applications were approved; 155 applications were denied; and 215 applications were suspended. For the month of November 2002, of the 1734 applications that were processed, 1243 applications were approved; 276 applications were denied; and 215 applications were suspended. Mr. Bishop reviewed with the NANC, the October and November 2002 System Performance Reports that were submitted to the FCC by the PA. He reported that for the month of October 2002, the percent available was 99.99, with 719 hours and 2 seconds of availability. There was one instance of unavailability for 58 seconds due to an emergency patch that had to be put in the system. Mr. Bishop reported that for the month of November 2002, the availability was 100%, with 744 hours of availability.

Ms. Bell once again inquired as to whether, during the interim, it is possible to configure something, with the current parameters of the PAS, that would allow for providers not to experience a denial or rejection of their applications. She had previously made this inquiry during the presentation of the NAOWG Report. Mr. Bishop responded no. He explained that the only thing that can be done would be to make a change to the system.

After extensive discussion, it was again decided that the NAOWG would transmit the PAS Forecasting Report to Mark Oakey, the FCC Contracting Officer. The NAOWG will take a look at whether there is any feasibility of “work arounds” other than to change the forecasts, but not spend a lot of effort until we hear back from Mr. Oakey on whether the PAS is going to change. Chairman Atkinson stated that if there is no change to the PAS, then presumably, there might be a more intense effort on other “work arounds”.

Sanford Williams gave an update on the new NANPA Contract. Mr. Williams stated that the NANPA Procurement is temporarily on hold. The FCC issued an RFP and received some questions that need to be addressed. Once those questions are addressed, the procurement will be back on schedule. Arrangements have been made with the current NANPA to remain in place until a new NANPA is named.

E. Contamination Threshold IMG – (Petition of the California Public Utilities Commission and the People of the State of California for Waiver of the Federal Communications Commission’s Contamination Threshold Rule). Beth O’Donnell stated that the IMG met four times since the FCC issued its call for comments. She reported that the IMG settled on a few assumptions and a few agreements. Ms. O’Donnell stated that they only looked at California and that they were not going to be assessing the implications of this nationwide. The IMG settled on figures that were supplied by the California PUC in its Petition. The IMG also noted an updated figure provided by NeuStar – that there will be 7,000 codes as of July that would have from 11-25% contamination, and thus be implicated by the Petition for Waiver. An updated figure in November was a little more than 6,200 codes. Ms. O’Donnell advised that the IMG is operating on the assumption that they are not doing a cost analysis, and not weighing the costs against the benefits because they are doing an analysis of the technical viability, not necessarily the cost issues involved. She indicated that the IMG did reach two agreements overall, but not formally. The IMG agreed, in general, that most things are technically feasible. They took another look at technical viability, not technical feasibility. The IMG reviewed the definitions of technical feasibility versus viability. They put together a list of what contributed to technical viability. The IMG also agreed that they were not going to go through each of these points and get to whether or not the attribute led them to a finding on the technical viability. Ms. O’Donnell stated that the IMG drafted the report to say that technical viability is very subjective, and that the FCC will be supplied information by individual carriers. The report recommends that the FCC use this report and assess the technical viability based on information from other carriers. Ms. O’Donnell indicated that it is an actual analysis of technical viability for the NANC to put forward to the FCC.

After extensive discussion, Chairman Atkinson stated that the IMG proposal is an incomplete success. He pointed out that the deadline for providing NANC's findings to the FCC is December 13, 2002. It was decided that the NANC needed more information to understand the major views in order to reach a consensus. Chairman Atkinson proposed that the IMG make one more effort to produce a recommended or proposed finding. The IMG will prepare proposed NANC findings no later than December 6, 2002. A conference call will be scheduled for December 11, 2002. Chairman Atkinson advised that he will circulate to the NANC, a proposed letter for filing to the FCC by December 10 for discussion on the December 11, 2002 conference call.

F. Industry Numbering Committee (INC) Report. David Bench, INC Moderator, presented the report to the Council. Mr. Bench announced that this will be his last INC report as INC Moderator. He introduced Ms. Dana Smith as the new INC Moderator and Mr. Ken Havens as the new Assistant INC Moderator.

Mr. Bench reviewed the INC meeting schedule with the NANC. He reported on Grandfathered Wireless NXX Codes. Mr. Bench stated that the INC added text to the Thousands-Block Pooling Guidelines to direct the PA to set aside those blocks from wireless grandfathered NXXs that were donated to the pool. The PA cannot assign these blocks to SPs until regulatory authorities provide direction on how to handle these unique numbering resources.

Mr. Bench reported on the CIC Workshop. He stated that the INC agreed to set aside FG D CIC 0911 so it would be unavailable for assignment to any entity. Mr. Bench pointed out that in the foreseeable future, it could potentially be designated for emergency use. He noted that this non-assignable code was requested by NANPA. Mr. Bench reviewed the Committee Issue Summary and relevant INC web sites with the NANC.

G. NANP Expansion/Numbering Optimization IMG (NENO). Penn Pfautz, AT&T, presented the report to the Council. Mr. Pfautz announced that this is the final report of the NANP Expansion/Numbering Optimization IMG. He stated that the NENO took a set of measures that had been discussed at the NANC Optimization Measures and tried to assess those along with plans for NANP Expansion. Basically, the NENO focused on a set of 10 of those measures. They set aside and did not do further analysis on some because they seemed to lack definition, and it was determined that they were not NANP Exhaust deferral measures. Mr. Pfautz stated that the NENO took the 10 measures and agreed on a basic description. They wanted to document the availability, the constraints on the availability of these measures, the projected impact on the life of the NANP, costs, and other considerations. Mr. Pfautz reviewed the cost and benefit analysis summary. He stated that the NENO could not come up with absolute dollar costs. Mr. Pfautz further stated that no one really knows, and even if they did, they probably would not disclose what it would cost their company to implement these things. He advised that the NENO agreed on a relative cost approach where they would come up with some relative ranking of the costs of the different measures. Mr. Pfautz emphasized that you can not compare the costs across categories, only within. He indicated that since

thousands-block number pooling has been included, it may give some idea of what the costs are in terms of dollars and, potentially, can be a rough reference point when dealing with these numbers. Mr. Pfautz noted that, in general, any of the NRO measures are less costly than expanding the NANP. He reviewed the chart which summarized the quantitative analysis of the benefits.

Mr. Pfautz stated that the data suggests avenues that may be worth further investigation, but the NENO agrees that more extensive analysis should precede any decision to implement any of these measures. He indicated that the data are suggestive, but not conclusive. Mr. Pfautz stated that the NENO does not make any kind of implementation recommendation. He stated that he hoped that this report would provide some guidance as to what measures should be investigated further if it were to be concluded that more NRO measures needed to be implemented. Mr. Pfautz noted that there are other measures that the NENO did not fully examine because they came too late in the process. Over time, these conclusions may need to be re-examined as the environment changes and as technology evolves.

Mr. Pfautz thanked all of the Co-Chairs and NENO members, and the NANPA.

Chairman Atkinson indicated that he is looking for some mechanism that will keep this report alive and improving without being burdensome. He stated that the sense of crisis has gone away, but nevertheless, maybe it could come back as quickly as it went away. Chairman Atkinson questioned whether there is any further work that should be done by this IMG or another IMG.

After extensive discussion, it was decided that the NENO will draft a transmittal letter (no more than 3 pages) to the FCC and outline what the report is, the reasons why this report is important - noting some of the key issues, what should be done with the report, and note any proposed recommendations.

H. Report of the NANC Intermediate Numbering/Soft Dial Tone (IN/SDT) IMG.

Deborah Bell, SBC, presented the report to the Council. Ms. Bell reported that the IN/SDT IMG made some modifications in their recommendations that were presented at the September NANC meeting. She stated that the following definition of intermediate numbers remains the same: Intermediate Numbers are included in numbers assigned by the national administrator (NANPA or PA) to a carrier (Party A) that in turn establishes a secondary inventory of numbers dedicated for use by another entity (Party B) responsible for the assignment of the numbers to end-user customers. Therefore, the numbers are not available to Party A for assignment to its end-user customers.

Ms. Bell reviewed the following modifications with the Council. NRUF - In support of the revised definition above, the following are the impacts to NRUF and any recommended changes: Party A would continue to document any intermediate number blocks on NRUF. Party A would continue to identify Party B in the notes/Assignee field. If Party B does not have an OCN, continue to enter the entity name. The change is: If Party B has an OCN, enter only the OCN and not the entity name. This direction is

accomplished via a change to NANPA's NRUF Job Aid. The NRUF calculation that automatically excludes INs should remain as is. Once the FCC clarifies the definition of Intermediate Numbers, monitor two cycles of NRUF reports to determine the quantity of INs in the industry. This will give an idea of the scope of the issue. Only then should consideration be given to establishing a percentage threshold of INs in a SP's inventory that warrants further examination by regulators.

Utilization Calculation on INC MTE Worksheet – Ms. Bell stated that the IMG suggests two alternatives and prefers Alternative A. The modification to Alternative A is: For the purpose of calculating utilization on the MTE worksheet, Intermediate Numbers should be treated the same as Assigned Numbers. The SP receiving the resource directly from NANPA designates in internal systems that these TNs are NOT available for assignment to its end-user customers and are NOT available for its own internal use. Change is needed on the INC MTE worksheet. Change would be needed to the NRUF so that Intermediate Numbers remains a separate category but the embedded NRUF calculation will require modification. Change to the utilization calculation – the numbering resource utilization level shall be calculated by dividing all assigned numbers and intermediate numbers by the total numbering resources in the applicant's inventory and multiplying the result by 100. Numbering resources activated in the Local Exchange Routing Guide (LERG) within the preceding 90 days of reporting utilization levels may be excluded from the utilization calculation.

The modification to Alternative B is: Intermediate Numbers remains a standalone category and is specifically itemized as being removed from the denominator of the utilization formula. Change would be needed on the INC MTE worksheet. No change is needed on the NRUF. Change to the utilization calculation – the numbering resource utilization level shall be calculated by dividing all assigned numbers by the total numbering resources in the applicant's inventory minus the intermediate numbers and multiplying the result by 100. Numbering resource activated in the Local Exchange Routing Guide (LERG) within the preceding 90 days of reporting utilization levels may be excluded from the utilization calculation.

Ms. Mickiewicz reviewed proposed revisions from the California Public Utilities Commission (CPUC) to the IN/SDT IMG's recommendations. Chairman Atkinson suggested that the IN/SDT IMG and the CPUC have a quick conference call for further discussion to settle their differences. The final text should be emailed to the NANC members. Chairman Atkinson will provide a cover letter to the FCC to initiate an NPRM. He stated that if the differences can not be settled, the word-smithing can be done during the comment phase on the NPRM.

Ms. Bell reported on the IN/SDT IMG's review of Soft Dial Tone Numbers. She stated that concerns over the potential impact of Soft Dial Tone (SDT) Numbers was also discussed at the May and July 2002 NANC meetings. SDT Numbers generally are used to satisfy a legislative or regulatory mandate to provide 911 emergency access on all residential lines. Local exchange carriers (LECs) who provide dial tone at a location where phone service has been suspended or disconnected are obligated, in some

jurisdictions, to provide restricted dialing ability to enable contract with 911 operators. SDT is sometimes referred to as a warm dial tone or quick dial tone.

Ms. Bell stated that the IN/SDT's goal was to present findings and possible recommendations to the NANC. She further stated that although SDT may not presently be causing the problem when qualifying for utilization threshold, as the threshold continues to rise, so does the potential for a problem. This is a proactive approach to present a case for the NANC to evaluate.

Ms. Bell reported that after hours of discussion, the IN/SDT IMG agreed that the following points capture the main concerns: SDT Numbers are not available for assignment by the carrier as long as these numbers provide Soft-Dial Tone service. SDT Numbers are "working in the PSTN" by virtue of providing commission-ordered out-dial capability for emergency service. Carriers are unable to provision SDT service without consuming telephone numbers, switching capacity and terminations, and local telephone facilities. Since SDT Numbers are not included in the numerator of the utilization calculation, this affects a carrier's ability to obtain additional numbering resources. SDT Numbers limit the carrier's ability to achieve utilization thresholds.

The IN/SDT IMG recommends that the FCC allow numbers associated with Soft-Dial Tone obligations to be categorized as "assigned" numbers. Such a definition would be appropriate since the FCC defines "A number in soft dial tone as a number temporarily assigned to line equipment and facilities which permits restricted dialing. The FCC should direct NANPA and the PA to inform carriers that Soft-Dial Tone Numbers should be deemed a sub-category of assigned numbers when calculating utilization levels. No change is needed to the format of the current utilization calculation on the INC MTE worksheet.

Mr. Bench pointed out that there is no mention in the report that a telephone number is not needed for Soft-Dial Tone, a warm line, or to out-dial. Ms. Bell stated that recognition was given to that fact in the report, by stating "usually" rather than 100 percent. Mr. Bench suggested that numbers associated with Soft-Dial Tone be used instead of Soft-Dial Tone Numbers because these classifications are mutually exclusive.

After extensive discussion, it was agreed that the IN/SDT IMG will consider the CPUC's comments on Soft-Dial Tone on the same conference call considering the CPUC's comments on Intermediate Numbers. Chairman Atkinson asked the NANC members to email editorial comments to Ms. Bell. He advised that no NPRM is required. He advised that it the IMG has composed a recommendation that the FCC direct NANPA and the PA to implement the recommendations.

I. Local Number Portability Report (LNPA). Gary Sacra, Verizon, presented the report to the Council. Mr. Sacra stated that Release 3.2 is progressing. He advised that Release 3.2 contains Change Orders that have a higher priority of improvements to the data recovery process, edits to prevent the input of erroneous porting data, and the ability to change NXX code ownership in NPAC without taking ported customers temporarily

out of service. Mr. Sacra advised that the latter Change Order, even though it is part of NPAC Release 3.2, will not actually go into production until some months after Release 3.2 is implemented. In order to ensure that Service Providers and their vendors have sufficient time to complete Release 3.2 turn-up testing, the LNPA has recommended to NAPM that 2 weeks be added to the Service Provider Individual Turn-up Testing interval (March 4, 2003 – April 25, 2003). In addition, the LNPA is recommends that NAPM add 1 week to the Service Provider Group and Performance Testing interval (April 28, 2003 – May 14, 2003). The first Region will go into production with NPAC Release 3.2 on May 19, 2003. Subsequently, the additional regions will be rolled out. This recommendation will be discussed at the November NAPM meeting. Mr. Sacra reported that the LNPA Working Group is continuing ongoing discussions of ways to improve porting performance. The LNPA agreed to form an architecture planning team to identify future direction and functionality. Discussions will include ways to enhance the existing CMIP protocol in order to improve performance. Mr. Sacra explained that the CMIP protocol is the protocol that is used for the interfaces between NPAC and SOA and between NPAC and the LSMS. In addition the group is going to investigate possible alternatives to CMIP protocol. The group will also discuss possible changes to the current association about strategy. The architecture planning team will begin meeting in January 2003. Mr. Sacra reviewed the PIM report with the Council.

Wireless Number Portability Operations (WNPO) Report to the NANC. Mr. Sacra reported that with the advent of number pooling and number portability, telemarketers will no longer be able to identify wireline numbers based on NPA-NXX. Contributions regarding this issue were discussed. Wireless service providers are concerned that their customers will start receiving telemarketing calls because the telemarketer can not distinguish wireless and wireline telephone numbers. By law, telemarketers are not supposed to call wireless telephone numbers. In a pooling or porting environment there will be a potential impact from telemarketers after November 24, 2002 on the wireless customer.

The matrix containing wireless specific parameters was updated. The hours for the Long Business Days were discussed. There were changes to the effective dates for the test beds and production system. A request to implement these changes was sent to the NAPM LLC. A proposed update to the Guidelines for Type 1 Number Migration was discussed. This update involved the provision of SS7 functionality on Type 1 trunks. The update was approved with a modification to some of the language. An issue regarding extended permissive dialing periods for NPA splits was discussed. It was agreed that because wireless and wireline service providers will be sharing codes in the pooling/porting environment, the end date for permissive dialing for area code splits must be the same date for both wireless and wireline service providers. Several contributions regarding the JIP (Jurisdiction Information Parameter) were discussed. Concern was expressed that there may be large numbers of pooled blocks activated over the next month or two because in some areas, wireless service providers have not been able to obtain new codes in order to maintain a six month inventory of numbers. Information provided by the PA indicated that a revised Pool Assessment Report would be published and distributed in the near future.

Mr. Sacra reported that there is no new entrant testing occurring at this time. Work is underway on Release 3.2. There are a total of 35 wireless service providers who have completed NDAs, applications, and inter-connection plans as of the end of October. A total of 7 wireless service providers or service bureaus have completed new entrant testing. NeuStar also reported that there are currently 154,826 wireless intra-service provider ports that have been complete. WNPO requested that NeuStar also provide a similar report for November wireless intra-service provider ports since it is recognized that not all work was completed by October 31, 2002.

A report was presented by the National Emergency Number Association (NENA) representative. NENA is in the process of forming a technical working group to identify issues related to call blocking and emergency service numbers, and how to resolve those issues. There is a study group under the Emergency Services Interconnect Forum (ESIF) working an issue to determine what is to be delivered to the PSAP on a 911 call that will be used as a possible call-back number from an uninitialized phone. Lessons learned and problems identified during inter-carrier testing were discussed. Resolutions for all problems relating to inter-carrier testing of calls to emergency service have been identified. There are no unresolved problems at this time.

The WTSC reported that by November 24, 2002, inter-carrier testing will have been completed in eight MSAs. Seven wireless service providers and three wireline service providers will have participated in inter-carrier testing in at least one of those MSAs.

Mr. O'Connor indicated that there are some area codes that are in extended permissive dialing from which blocks may be donated. He stated that those blocks should not be assigned until the extended permissive period is done. Mr. Sacra agreed. After a brief discussion, it was decided that the PA will take care of the problem. Mr. Bishop stated that NeuStar will be working with the WNPO and make the FCC, the NANC and the states aware of the outcome. He further stated that, NeuStar will bring in contributions to the INC for the guidelines if it is appropriate.

J. NBANC Report. John Ricker, NBANC, presented the report to the Council. Mr. Ricker reported that as of October 31, 2002, the current fund balance is \$11.4 Million. The projected receivables for 2002-2003 are \$3.67 Million from monthly contributors. Payments to NeuStar for NANPA and CO Code Administration - \$1.76 Million for the 5th funding year; Remaining \$3.66 Million. Payments to NeuStar for Pooling Administrator – June 2001 - \$3.28 Million; July 2002 - \$584 Thousand; Remaining - \$616 Thousand. Payments to NeuStar for Pooling Administrator for 2002-2003 - \$640 Thousand; Remaining - \$2.4 Million. Payments to NANPA Auditor – Year to date - \$177 Thousand; Remaining - \$523 Thousand. Payments for COCUS Replacement - \$203 Thousand; Remaining - \$203 Thousand; Payments to Mitre Corp. – September 15, 2002 Letter Contract for PA procurement and NANPA equitable adjustment; Year to date - \$1,670.82 for PA; Year to date - \$360.36 for NANPA. February 6, 2002 Contract for NANPA procurement - \$288 Thousand; Year to date - \$145 Thousand; Remaining - \$143 Thousand. Payments to NECA for NBANC's operation for 2002-2003 – Year to date -

\$104 Thousand; Remaining - \$247 Thousand. Payments for Board Expenses for 2002-2003 – Year to date - \$3,004; Remaining - \$21,996. Payments to External Auditor, Withum Smith & Brown, Auditor of 2001-2002 Operations - \$29 Thousand; Remaining \$28,680.

Mr. Ricker advised that the audit report for NBANC was clean. He noted that on October 29, 2002, NBANC submitted its first quarterly report, which cover the period July 1, 2002 through September 30, 2002. Mr. Ricker further noted that on November 5, 2002, NBANC submitted the Delinquency Summary Report, as well as a listing of all of the carriers that have not yet complied with their requirement to contribute. Mr. Ricker advised that NBANC will now be reviewed by the FCC's external auditor.

K. Report on VOIP Numbering Issues. Randy Sanders, BellSouth, presented the report to the Council. Mr. Sanders reported that the purpose of the Voice over Internet Protocol (VoIP) paper is to make the people that are doing numbering (the NANC, the FCC, and the State Commission) aware, from a numbering perspective only, of the impact of VoIP. He advised that it is not intended to be all-inclusive. Mr. Sanders stated that once other experts get involved, they will find other things that should be considered for the national numbering plan.

Mr. Sanders stated that there are several companies that offer VoIP service. He pointed out that some companies go so far as to say that it is a complete substitution for local service. He stated that some of the issues implicated are number porting, 911, i.e., some of the things that local service providers have to do, and that how they will use technology to accomplish this is something they will have to work on. Mr. Sanders stated that, for a fixed fee, you can get your own personal number that you can take with you or keep for the rest of your life, get unlimited calling, and various other features. Service providers offer the possibility of having multiple numbers assigned to you. The numbers do not have to be numbers from the geographic NPA where you reside. There are no country boundaries. With this type of technology, the telephone number that you get does not necessarily have to be assigned in the United States.

Mr. Sanders reviewed some examples of VoIP service that were discovered on the Internet. Example one: VoIP providers do not obtain numbers directly from NANPA. They obtain numbers from LECs that have received numbers from NANPA. Today, the LEC service provider that provides the number to VoIP providers must report these numbers on NRUF as "Intermediate" numbers. The VoIP provider in turn re-assigns these numbers to their VoIP customers. Example two: A second VoIP service provider allows a customer to get a personal number based on the area code of the customer's choice. Also, each account includes voicemail that can be accessed from a telephone or from the web. This particular VoIP service provider advertises that customers can select any available area code from a list provided by the service provider, no matter where they live in the world.

Mr. Sanders reviewed some excerpts from industry guidelines established by the Industry Numbering Committee (INC) which identified numbering issues with VoIP type service.

Mr. Sanders indicated that there are jurisdictional issues. He stated that neither country, state, county, nor local municipality boundaries are defined. Mr. Sanders opined that the idea of administering this system will have to be re-thought.

Ms. O'Donnell questioned why these numbers are any different than any other intermediate number. She further questioned why a technology that is using intermediate numbers is being singled out, and why does anything have to be changed. Mr. Sanders in turn questioned how forecasts can be made in a particular NPA if it is not known where the end users are. Ms. O'Donnell questioned why that mattered. Chairman Atkinson commented that the NANC should be thinking more broadly. He further commented that the NANC should keep the Big Picture in mind, and think about the changes that VoIP will have on the whole system that has evolved over the prior 100 or so years for telephone numbers, i.e., what they are, how they are assigned, and what they do. Maureen Flood, CompTel, opined that it might be premature to engage in a lot of work on these issues. Ms. Mickiewicz questioned whether it is necessary to do anything about it. Ms. Mulberry suggested that the NANC should look at the efficiencies of the process. She stated that it could have some value and could tie into some of the work that NENO and others have been doing. Courtney Jackson, OUR, stated that there are countries in the Caribbean that have settlement rate issues. He indicated that some of the scenarios that were mentioned in the VoIP paper will have serious consequences for the settlement rate regime in those countries. Chairman Atkinson stated that that is a legitimate issue for a country to make, but it is not within the purview of the NANC. Chairman Atkinson questioned whether the NANC should continue to look at the potential impact of VoIP on the North American Numbering Plan.

After extensive discussion, Chairman Atkinson proposed that the NANC members who think that there is an important role for the NANC on the VoIP issue, should draft some proposed charters for any further work or working groups on the subject and circulate it before the January NANC meeting. He requested that the NANC members give their thoughts on things that the NANC should be doing pursuant to the NANC Charter relating to new technologies such as VoIP.

L. Approval of Meeting Minutes. Minutes of the September 24-25, 2002 NANC meeting will be approved electronically in order to give the NANC members time to review them.

M. Public Participation. None.

Next Meeting: January 22, 2003

November 19-20, 2002
NANC Meeting

Action Items and Decisions Reached:

1. NANC Chairman to prepare letter to transmit NAOWG's "Analysis and Report on Pooling Administration System (PAS) Forecasting Requirements."
2. NAOWG will consider feasibility of "work-arounds" so carriers can obtain number blocks if their request exceeds their PAS forecast.
3. Contamination Level IMG to prepare proposed NANC "findings" not later than December 6. NANC Chair to provide Members with draft of a proposed FCC filing by December 10. NANC conference call to discuss and approve a filing with the FCC on December 11.
4. Intermediate Numbers/Soft Dialtone IMG will consider California PUC's comments on Intermediate Numbers and forward a final report to the NANC Chairman, who will forward the report to the FCC with a recommendation that the FCC issue an NPRM to seek comment on recommendations. At the same time, the IMG will also consider the California PUC's comments on the Soft Dialtone recommendations and forward a final report to the NANC Chairman, who will then forward the report to the FCC with the recommendation that the FCC instruct the NANPA and the PA to implement the recommendations.